UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
v.)	No. 16-cr-10094-LTS
ROSS MCLELLAN,)	
Defendant)	
)	

DEFENDANT ROSS MCLELLAN'S EXHIBIT LIST

Defendant, Ross McLellan, by and through undersigned counsel, hereby respectfully submits the following list of potential defense exhibits to the Court in advance of the June 4, 2018 trial. The defendant reserves his right to supplement this list and/or to introduce documents or audios during his cross-examination of Government witnesses.

Respectfully Submitted, Ross McLellan By His Attorneys,

/s/ Martin G. Weinberg

Martin G. Weinberg Mass. Bar No. 519480 20 Park Plaza, Suite 1000 Boston, MA 02116 (617) 227-3700 owlmgw@att.net

/s/ Robert M. Goldstein

Robert M. Goldstein 20 Park Plaza, Suite 1000 Boston, MA 02116 (617) 742-9015 rmg@goldstein-lawfirm.com

Dated: May 31, 2018

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, May 31, 2018, a copy of the foregoing document has been served, via ECF, upon Assistant U.S. Attorney Stephen E. Frank and U.S. Department of Justice Trial Attorney William Johnston.

/s/ Martin G. Weinberg
Martin G. Weinberg

CASE NAME: UNITED STATES OF AMERICA V. ROSS MCLELLAN AS OF: May 29, 2018 CRIMINAL CASE NO. 16-10094-LTS DEFENSE'S EXHIBIT LIST Exhibit **Exhibit** Marked Admitted **BegDoc EndDoc** Doc Type Date To From Date Offered No. [Yes/No] [Yes/No] Admitted By: Defense 300 SS2 000000071 SS2 000000071 Email & 5/1/11 Simone Paul, Jonathan Sarah Lewis SS2 000000072 SS2 000000089 Attachment Norris SS2 000000090 SS2 000000104 Defense 301 RM-000001 RM-000004 File N/A Defense 302 RM-000005 RM-000008 File N/A Defense 303 SS2 00000066 SS2 00000068 Email 9/30/11 Carol L'Heveder, Jonathan Sarah Lewis Norris Defense 304 SS2 00000034 SS2 00000040 File 4/11/11 305 SS1_00088738 SS1 00088743 6/22/12 Defense Email Dominic Graham, Paul Michael Gregson Fraser, Abigail Greenway SS1 01342767 SS1 01342767 Robin Oliver, Marshall Mark Leaden Defense 306 Email 8/26/11 Bailey, Jonathan Norris 307 SS1_00810416 SS1_00810416 8/26/11 Mark Hansen Ross McLellan Defense Email 308 SS1_00584563 Defense SS1_00584563 Email 3/16/11 Ross McLellan Chris Carlin 309 SS1 01215715 SS1 01215716 9/5/11 Ross McLellan Brvan Woodard Defense Email 310 SS1 01215709 SS1 01215711 9/5/11 Ross McLellan Bryan Woodard Defense Email Defense 311 SS2 00000225 SS2 00000226 Email 11/3/10 David Puth Ross McLellan Mark Hansen Defense 312 SS2 00000002 SS2 00000003 Email 11/2/10 Anthony Scully SS2_00000127 Defense 313 SS2 00000127 Email 11/3/10 Simone Paul Sarah Lewis Defense 314 SS2 00000227 SS2 00000227 Email 11/3/10 Mark Hansen Ross McLellan Defense 315 SS2 00000229 SS2 00000230 Email 11/3/10 Ross McLellan Mark Hansen 316 SS2 00000260 SS2 00000262 11/3/10 Bryan Woodard Melissa Mckay Defense Email 317 SS1_00636326 SS1_00636330 11/3/10 Ross McLellan, Vincent Mark Hansen Defense Email Manzi et al. 318 SS1 00448645 SS1 00448645 1/5/10 Nick Bonn Ross McLellan Defense Email Defense 319 SS1 00300269 SS1 00300270 10/20/10 Ross McLellan, David Puth Karen Keenan Email 320 SS1 00957546 SS1 00957546 Ross McLellan Defense Email 10/21/10 Karen Keenan Defense 321 SS1 00958789 SS1 00958790 Email 11/2/10 Ross McLellan Karen Keenan 322 SS1 00230295 SS1 00230295 3/23/11 Ross McLellan **Edward Pennings** Defense Email 323 SS1 01136600 SS1 01136600 Ross McLellan Defense Email 3/22/11 Karen Keenan Defense 324 SS1 00628575 SS1 00628576 Email 12/22/10 Karen Keenan, David Puth Ross McLellan 12/22/10 Karen Keenan, David Puth Defense 325 SS1 00627649 SS1 00627650 Email Ross McLellan et al. 326 SS1_00873565 SS1_00873565 Karen Keenan Defense Email 1/28/11 Ross McLellan Defense 327 SS1 00758288 SS1 00758288 4/13/11 Ross McLellan Email Karen Keenan Defense 328 SS1 01217587 SS1 01217587 Email 9/27/11 Nick Bonn Ross McLellan SS1 01326547 Defense 329 12/24/10 SS1 00599299 SS1 00599300 Defense 330 Email 5/12/10 Ross McLellan, Vincent Melissa Mckay Manzi, Chris Carlin et al. SS2 00000213 Ross McLellan Melissa Mckay Defense 331 SS2 00000213 Email 11/2/10 Defense 332 SS2 00000113 SS2 00000113 Email 11/2/10 Melissa Mckay, Krystyna Simone Paul

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Deferee	373	DE Aviatan Cummani	DE Auston Cummon	Attachment	2/11/11	Andrew Williams Halan	Pon Gunnas	
Defense	3/3	RE Austen Summary	RE Austen Summary	Email	3/11/11	Andrew Williams, Helen	Ben Gunnee	
						Baldock		

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Defense	374	RE Project Austen	RE Austen Summary	Email	4/21/11	Rick Boomgaardt, Edward Pennings et al.	Anita Butler	
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Defense	468	SS2_0000144	SS2_00000145	Email	11/2/10	Ross McLellan, Edward	Tom Bryant	
						Pennings, Chris Carlin		
Defense	469	SS2_00000143	SS2_00000143	Email	11/2/10	Edward Pennings, Ross	Tom Bryant	
	1		_			McLellan, Chris Carlin		

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Defense	471	SS2_00000150	SS2_00000202	Email & Attachments	11/2/10	Ross McLellan	Edward Pennings
Defense	472	SS2_00000210	SS2_00000210	Email	11/2/10	Ross McLellan	Edward Pennings
Defense	473	SS2_00000234	SS2_00000236	Email	11/3/10	Edward Pennings	Ross McLellan
Defense	474	SS2_00000231	SS2_00000233	Email	11/3/10	Ross McLellan	Edward Pennings
Defense	475	SS2_00000237	SS2_00000240	Email	11/3/10	Ross McLellan	Edward Pennings
Defense	476	SS1_00667117	SS1_00667117	Email	11/3/10	Anandoth Poyil Krishnadasan	Edward Pennings
Defense	477	SS1_00502479	SS1_00502498	Email & Attachment	11/18/10	Anandoth Poyil Krishnadasan et al.	Adnan Choudhary
Defense	478	SS1_00620776	SS1_00620817	File	N/A	N/A	N/A
Defense	479	SS1_00758624	SS1_00758624	Email	4/6/11	Chris Carlin, Christopher Murphy	Ross McLellan
Defense	480	SS1_00471414	SS1_00471428	Email & Attachment	4/7/11	Killian Buckley et al.	Rick Boomgaardt
Defense	481	SS1_00128931	SS1_00128931	File	6/1/11		
Defense	482	SS_SEC_MCL000004874	SS_SEC_MCL000005237	File	N/A		
Defense	483	SS_SEC_MCL000001888	SS_SEC_MCL000002279	File	N/A		
Defense	484	SS_SEC_MCL000001868	SS_SEC_MCL000001571	File	N/A		
Defense	485	SS1_01346473	SS1_01346474	Email & Attachment	2/3/11	Rick Boomgaardt	Chris Carlin
Defense	486	SS1_00226564	SS1_00226568	Email & Attachment	2/24/11	Tom Bryant, Ian Holden, Ross McLellan et al.	Chris Carlin
Defense	487	SS1_00500497	SS1_00500499	Email & Attachment	6/17/10	Ross McLellan, Edward Pennings, Tom Bryant et al.	Chris Carlin
Defense	488	SS1_00217613	SS1_00217616	Email & Attachment	5/6/11	Ross McLellan, Edward Pennings, Tom Bryant et al.	Chris Carlin
Defense	489	SS3_000047095	SS3_000047542	File	N/A	•	
Defense	490	AXAStateStreetEmail34231	AXAStateStreetEmail34231	Email	3/24/11	Carla Byer, Brian Walsh, James Kelly	Kristen Morris
Defense	491	AXAStateStreetEmail00043	AXAStateStreetEmail00055	Email Attachment	N/A		
Defense	492	SS1_00275242	SS1_00275243	Email	3/1/11	Ross McLellan, Kevin Walker	Peter Weiner
Defense	493	SS1_00275660	SS1_00275666	Email	3/2/11	Account-service-ssgm et al.	Kristen Morris
Defense	494	SS1_00586205	SS1_00586206	Email	3/18/11	Kevin Walker	Ross McLellan
Defense	495	SS1_00275041	SS1_00275043	Email	2/22/11	Ross McLellan	Kevin Walker
Defense	496	SS1_00273649	SS1_00273649	Email	3/1/11	Ross McLellan, Kevin Walker et al.	Chris Carlin
Defense	497	AXA-SSB-000494	AXA-SSB-000498	File	N/A		
Defense	498	SS3_000054535	SS3_000054626	File	N/A		
Defense	499	SS3_000060557	SS3_000060557	File	N/A		

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Defense	500	SS3_000046421	SS3_000046421	Email	10/3/11	Trading Solutions et al.	Allyson O'Connor
Defense	501	SS1_01123848	SS1_01123848	Email	8/30/11	Jack Ho, Niall O'Sullivan	Marc Littlewood
Defense	502	SS1_00732870	SS1_00732870	Email	6/2/11	Paul Gallagher, Michael Mahoney et al.	Christopher Martin
Defense	503	SS1_01198238	SS1_01198241	Email	5/4/11	Rick Boomgaardt, Cassie Waller et al.	Raymond Pestana
Defense	504	SS1_00460089	SS1_00460089	Email	5/30/11	Edward Pennings, Rick Boomgaardt	Faheem Malik
Defense	505	SS1_01157292	SS1_01157293	Email and Attachment	6/16/11	Edward Pennings, Rick Boomgaardt et al.	Killian Buckley
Defense	506	SS1_01165632	SS1_01165632	Email and Attachment	6/22/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	507	SS1_00077222	SS1_00077222	Email	10/30/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	508	SS1_00075059	SS1_00075060	Email	3/3/11	Edward Pennings, Rodney Ringrow	Anadoth Poyil Krishnadasan l
Defense	509	SS1_00553373	SS1_00553373	Email	2/15/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	510	SS1_00073667	SS1_00073667	Email	12/20/10	Edward Pennings, Michael Gardner et al.	Anadoth Poyil Krishnadasan
Defense	511	SS3_000055445	SS3_000055445	Email	4/7/11	Thomas McNichol	Kevin Walker
Defense	512	SS3_000050625	SS3_000050625	Email	3/8/2011	Kristen Morris, Allen Kwong	Michael Brunell
Defense	513	SS3_000046340	SS3_000046342	Email	3/1/11	Michael Brunnell, Christoher Baker et al.	Renee Isberg
Defense	514	SS3_000046325	SS3_000046325	Email	3/1/11	Michael Brunnell, Christoher Baker et al.	Renee Isberg
Defense	515	SS3_000046240	SS3_000046241	Email and Attachment	8/2/11	Chris Carlin, Kevin Miller	Jason Lawrence
Defense	516	SS3_000046180	SS3_000046180	Email	3/10/11	William Andrade	Kristen Morris
Defense	517	SS3_000054370	SS3_000054390	File	N/A		
Defense	518	SS1_01357792	SS1_01357792	Email	3/2/11	Chris Carlin, Kevin Walker et al.	Thomas McNichol
Defense	519	SS1_01357793	SS1_01357795	Email	3/4/11	Kristen Morris	Chris Carlin